

capacity, challenge the facts and legal arguments put forward by the Estrada-Martinez Defendants establishing that Plaintiff's claims are barred by limitations."

The Estrada-Martinez Defendants, although the Parties have not yet initiated discovery, have offered to deliver documentation to Plaintiff establishing that the Estrada-Martinez Defendants purchased the property in question for value in excess of that alleged by Plaintiff in paragraph 7 and paragraphs 37 through 39 of the Amended Complaint, in exchange for a full dismissal of the claims brought by Plaintiff against the Estrada-Martinez Defendants. As of the submission of this Follow-Up Joint Status Report, Plaintiff's counsel is waiting on a response from Plaintiff concerning the foregoing proposal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2024, a true and correct copy of the foregoing was served in the manner described below on the following:

VIA ECF Notification:

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